

## Attachment A

### Proposed Document Late Notice Regarding Expert Testimony

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRANDON CASERTA,

Defendant.

Case No: 1:20-CR-183

Honorable Robert J. Jonker

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**LATE NOTICE REGARDING EXPERT TESTIMONY**

Defendant, BRANDON CASERTA, by his attorney Michael D. Hills, hereby provides notice pursuant to Fed. R. Cim. P. 16(a)(1)(G) that he intends to call the following witness.

**Eric Dorenbush, Instructor/Owner at Green Eye Tactical**

Counsel does not have a summary, however, Counsel expects Mr. Dorenbush to testify regarding the training that was conducted by the alleged co-conspirators over the course of the alleged conspiracy. There are several videos that captured said training. It is expected that Mr. Dorenbush will give an opinion that the training and techniques used in the training videos are not necessarily offensive in nature. Further, that these are training techniques, or variations of training techniques, that are available for purchase by professional trainers. Mr. Dorenbush can establish the approximate cost for such training that CHS Dan and UCE Red were providing at no charge to this group.

Mr. Dorenbush does not have a formal resume, however, Counsel attaches to this motion Mr. Dorenbush's military history and education that qualifies him as an expert.

Dated: February 14, 2022

Respectfully submitted,

/s/ Michael D. Hills /  
Attorney for Defendant

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## Attachment A

### Mr. Dorenbusch's Qualifications

Eric Dorenbusch  
Owner/Instructor of Green Eye Tactical  
214-663-8628 / [eric@greeneyetactical.com](mailto:eric@greeneyetactical.com)

## **Experience**

Owner/ Instructor  
Green Eye Tactical  
Oct 2012 - Present · 9 yrs 5 mos  
McKinney, Texas

- Providing scalable training packages for individuals and agencies.
- Basic and Advanced Tactical Carbine
- Basic and Advanced Tactical Pistol
- Night Vision Device Training and Marksmanship
- Close Quarters Battle
- Explosive Entry
- Vertical Access and Entry
- Tactical Patrolling and Navigation
- Assault Procedures and Techniques
- Texas License to Carry Instructor
- NRA Pistol Instructor
- NRA Rifle Instructor
- NRA Home Firearm Safety Instructor
- NRA Range Safety Officer Instructor

Special Operations Instructor  
Spectre Training and Evaluation, Al Ain UAE  
Feb 2010 - Aug 2012 · 2 yrs 7 mos

- Special Operations Instructor for the UAE Special Operations School
- Plans, coordinates, and conducts training in all aspects of Infantry and Special Operations Forces (SOF) training
- Subject Matter Expert for weapons and marksmanship training
- Planned, Developed, and Implemented the Basic Rifle Marksmanship program for the UAE SOS
- Planned, Developed, and Implemented the Land Navigation Course for the UAE SOS
- Planned, Developed, and Implemented the Close Combat Marksmanship (rifle) Course for the UAE SOS

- Primary Marksmanship Instructor for UAE Special Forces Task Force Afghanistan pre-deployment training
- Primary Navigation Instructor for UAE Special Forces Task Force Afghanistan pre-deployment training
- Planned and supervised numerous live fire training events.
- Developed training plan for UAE internal security emergency response force
- Developed and implemented basic combat rifle marksmanship course for UAE Special Forces
- Developed and implemented advanced combat marksmanship course for UAE Special Forces
- Planned and conducted UAE Special Forces Task Force- Afghanistan pre-deployment training
- Plans and instructs daily training events including: Small Unit Tactics, rifle and pistol marksmanship, land navigation, individual/team/squad fire and movement, combat battle drills, mission planning and preparation, anti-armor weapons

#### Training NCO

USASOC

Jan 2009 - Feb 2010 · 1 yr 2 mos Jan 2009 - Feb 2010 · 1 yr 2 mos

Fort Bragg, NC

- Operations Command and U.S. Army Special Forces Command
- Plans and coordinates logistical and administrative requirements for all training including airborne operations
- Instruct personnel in basic and advanced combat marksmanship, vertical wind tunnel training, and high angle rescue
- Maintains APFT, CTT, and range firing records, jump logs, and school development for over 580 soldiers
- Performs as instructor, test coordinator, and foreign airborne operations liaison

#### Team Member/ Operator

1st SFOD-D

Nov 2003 - Jan 2009 · 5 yrs 3

Fort Bragg, NC

- Member of a specifically selected, highly trained special operations team (SFOD-A equivalent)
- Conducted over 500 high-risk direct action combat missions to kill or capture High Value Targets

- Acted as Squadron subject matter expert in biometric processing and identification during combat operations
- Fabricated and developed Military Freefall oxygen mask harness for ACH helmet, currently validated and in use
- Fabricated and developed overhead strap system currently used to secure ladders in 160th SOAR MH-60 Blackhawk helicopters
- Participates daily in high-risk operations and training; plans and conducts individual operations, direct action, special reconnaissance, and other sensitive missions
- Trains in marksmanship, close quarters combat (CQB), explosive entry techniques, jungle, desert, mountain, and urban operations; maintains readiness for recall and worldwide deployment
- Instructs Advanced marksmanship, close quarters combat, and various Special Operations techniques to U.S. and foreign personnel
- Responsible for equipment and sensitive items valued in excess of \$750,000

82nd ABN DIV, US Army

5 yrs 9 mos

Fort Bragg, NC

Rifle Squad Leader

Jun 2002 - Nov 2003 · 1 yr 6 mos

- Participated in combat operations in Afghanistan
- Responsible for the execution of training, health, welfare and morale of a 9 man Airborne Infantry Squad
- Responsible for training and maintaining the capable of deploying worldwide within 18 hours to conduct offensive operations to include: Airfield Seizure, Airborne Assault, Air Assault Raid, Ambush, and other military operations to achieve the goals, policies, and objectives of the National Command Authority and the United States
- Further responsible for all mission essential equipment valued in excess of \$100,000
- Participated in combat operations in Afghanistan Responsible for the execution of training, health, welfare and morale of a 9 man Airborne Infantry Squad
- Responsible for training and maintaining the capable of deploying worldwide within 18 hours to conduct offensive operations to include: Airfield Seizure, Airborne Assault, Air Assault Raid, Ambush, and other

military operations to achieve the goals, policies, and objectives of the National Command Authority and the United States

- Further responsible for all mission essential equipment valued in excess of \$100,000

#### Section Leader

Mar 1998 - Jun 2002 · 4 yrs 4 mos

- Participated in peacekeeping operations in Kosovo
- Selected by the 82nd Airborne Division to compete in the 2000 Best Ranger Competition
- Placed 2nd in 82nd Airborne Division Soldier of the Year competition
- Airborne Anti-Armor Section Leader, responsible for the training, discipline, health and welfare of 5 soldiers, their weapons and equipment
- Knowledgeable in both mounted and dismounted tactics of airborne and air assault operations
- Responsible for the equipment maintenance and accountability of three HMMWV's (Humvees), two TOW 2 weapon systems, one M2 .50 Machine Gun, and one MK-19 grenade launcher and multiple pieces of electronic and communications equipment valued over \$100,000

#### Infantry Mortar Gunner

US Army

Mar 1994 - Mar 1998 · 4 yrs 1 mo

- Mortar Gunner responsible for the employment of a 60mm Mortar weapon system
- Maintains and is responsible for the accountability of personal weapons and equipment valued over \$60,000.

#### **Education**

American Military University

Intelligence Studies – 38 credit hours

#### **Languages**

Arabic - Professional working proficiency

English - Native proficiency

German - Limited working proficiency



## **Skills**

- Counterterrorism
- Military
- Firearms
- Military Operations
- Reconnaissance
- Army
- Command
- Homeland Security
- CQB
- Afghanistan
- Security
- Marksmanship
- Physical Security
- Force Protection
- Small Unit Tactics
- Security Operations
- Surveillance
- Executive Protection
- Counterinsurgency
- Explosives
- Counterintelligence
- Personal Protection
- Intelligence Analysis
- Personal Security
- Intelligence
- HUMINT
- Defense
- National Security
- Operational Planning
- Law Enforcement Operations
- Close Protection
- Pistol
- Enforcement
- Hostage Rescue
- Defensive Driving
- Problem Solving
- Security Clearance
- Rifle Marksmanship
- Pistol Marksmanship
- NRA Certified Instructor
- Surreptitious Entry
- Vehicle Acquisition
- Urban Climbing
- Close Quarters Battle
- Military Freefall
- Advanced Combat Marksmanship
- Explosive Breaching